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June 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

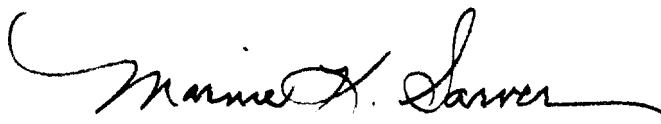
Re: DTV Channel 4, Macon, GA
SUPPLEMENT TO PETITION FOR
RULE MAKING – BPRM-20000328ABQ

Dear Ms. Salas:

On behalf of Gannett Georgia, L.P., licensee of Television Station WMAZ-DT, Macon, Georgia, we are submitting herewith an original and four (4) copies of a Supplement to the above-referenced Petition for Rule Making submitted December 8, 1999 to change the DTV channel allotted for use by WMAZ-DT from Channel 45 to Channel 4. The supplement provides an analysis of possible conflict with prospective Class A television stations and concludes that there is no conflict.

If further information is required, please direct inquiries and correspondence to the undersigned.

Sincerely,



Marnie K. Sarver

Enclosures

No. of Copies rec'd at 4
List A B C D E

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20557**

In the Matter of)	
)	
Amendment of Section 73.622(b) of)	MM Docket No.
the Commission's Rules, DTV)	RM No. BPRM-20000328ABQ
Table of Allotments)	
(Macon, Georgia))	

To: Chief, Video Services Division
Mass Media Bureau

SUPPLEMENT TO PETITION FOR RULEMAKING

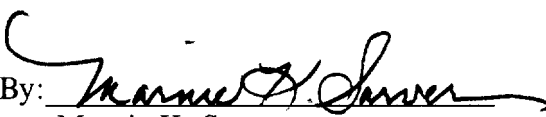
1. Gannett Georgia, L.P. ("Gannett"), by its attorneys and pursuant to Section 73.623 of the Commission's rules, 77 C.F.R. §73.623, hereby supplements its Petition for Rulemaking ("Petition") dated December 8, 1999 seeking to amend the Table of Allotments for the digital television service ("DTV Table") to change the initial DTV channel allotment for station WMAZ-DT, Macon, Georgia, from channel 45 to channel 4.

2. At the request of FCC staff, Gannett has examined the impact that the proposed channel change would have on low power television stations that have been certified as eligible for licensing in the new Class A Television Service. As set forth in the attached statement of Joseph M. Davis, P.E., of Cavell, Mertz & Davis, Gannett's consulting engineers, the proposed operation of WMAZ-DT on channel 4 will not have an adverse impact on any low power or television translator station that has been declared eligible for a Class A license.

3. In light of the foregoing and the information provided in the Petition, Gannett respectfully requests that the Commission commence a rulemaking proceeding to amend the DTV Table of Allotments to allot and assign DTV channel 4 (in lieu of channel 45) to Macon, Georgia, for use by WMAZ-DT.

Respectfully submitted,

GANNETT GEORGIA, L.P.

By: 
Marnie K. Sarver
of
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Its Attorneys

June 28, 2000

Engineering Statement
prepared for
Gannett Georgia, L.P.
WMAZ-DT Macon, Georgia

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This engineering statement has been prepared on behalf of *Gannett Georgia, L.P.* (*Gannett*), licensee of station WMAZ-TV, Macon, Georgia. *Gannett* has filed a *Petition for Rulemaking* with the Commission (file number BPRM-20000328ABQ) to change the "paired" DTV channel for WMAZ-DT from Channel 45 to Channel 4. This statement provides a review of the DTV Channel 4 proposal with respect to possible conflict with prospective Class A television stations.

Discussion

An allocation study of possible conflicts was conducted with respect to Low Power Television (LPTV) / translator stations that may be eligible for Class A status.¹ The study determined that the following LPTV / translator stations are close enough to *Gannett's* proposed DTV Channel 4 facility to warrant detailed review:

Channel	Call		City		State	Lat	Distance
Applicant/Licensee						Long	Bearing
=====							
3N	W03AO	LIC	Zn: MADISON		, FL	30-27-12	255.55
THOMAS H. & MARY E. GREENE				0.03 kW	OM	83-22-30	176.04
4Z	WKXE-LP	LIC	Zn: KNOXVILLE		, TN	36- 0- 8	362.19
DWIGHT R. MAGNUSON				0.03 kW	OM	83-56-41	354.49
4+	W04CB	LIC	Zn: SYLACAUGA		, AL	33- 8-23	255.95
BIRMINGHAM TELEVISION CORPORATION				0.17 kW	OM	86-15-26	280.38
4N	W04BJ	LIC	Zn: YOUNG HARRIS		, GA	34-55-22	242.10
GA PUBLIC TELECOMMUNICATIONS COMM.				0.01 kW	OM	83-50-26	353.90
4Z	W04DB	CP	Zn: ATLANTA		, GA	34- 4- 2	168.00
VVI LPTV, INC.				2.50 kW	OM	84-27-23	330.45

From the list above, a study was made to determine which LPTV stations' protected contours are overlapped by the corresponding interfering contour from the proposed WMAZ-DT facility, using the criteria of §73.623(c)(5). With respect to interference caused from the various LPTV

¹The Commission recently created a new class of television stations. See *Establishment of a Class A Television Service*, MM Docket 00-10, FCC 00-115, released April 4, 2000.

Engineering Statement

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stations to the proposed WMAZ-DT facility, an evaluation was conducted per §73.6013, which would require that an analog Class A station not cause 0.5 percent (or more) interference to a DTV facility's service population. The detailed interference study was conducted in accordance with the terrain dependent Longley-Rice point-to-point propagation model, per the Commission's Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, July 2, 1997 ("OET-69").²

Contour overlap to station W04DB (that would be prohibited under §73.623) would occur from the proposed WMAZ-DT facility. Also, the proposed WMAZ-DT facility would experience interference from W04DB (as determined under the OET-69 criteria, per §73.6013). No other LPTV stations listed above would experience or cause interference with respect to the proposed WMAZ-DT facility.

However, W04DB is not on the Commission's June 2, 2000 list of stations deemed eligible to file an application for Class A station status.³ Further, W04DB is on the Commission's June 9, 2000 list of stations that have not certified full compliance with statutory programming requirements and its statement of eligibility for Class A status was deemed materially deficient and dismissed.⁴ Thus, protection to W04DB is not required.

As discussed above, contour overlap is not caused and interference is not received from any LPTV station, except for W04DB, which is not eligible for a Class A license. If a waiver of any Rule or policy regarding Class A stations is required, then one is respectfully requested on behalf of the applicant for the reasons stated above.

²The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein, except that the terrain profile step size is 0.1 km (which provides a finer resolution than the Commission's standard 1 km step size). A standard cell size of 2 km was used. The service area for the proposed WMAZ-DT facility is that area predicted to receive signal levels of at least 28 dB μ using the Longley-Rice methodology, and within the DTV F(50,90) 28 dB μ service contour distance as determined per §73.625(b). Comparisons of various results of this computer program to the Commission's implementation of OET-69 show good correlation.

³See June 2, 2000 Public Notice *Certificates of Eligibility for Class A Television Station Status*, DA 00-1224.

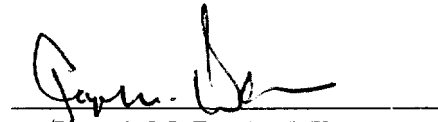
⁴See June 9, 2000 Public Notice *Dismissal of LPTV Licensee Certificates of Eligibility for Class A Television Station Status*, DA 00-1227.

Engineering Statement

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Certification

Under the penalty of perjury, the undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief. Mr. Davis is a principal in the firm of *Cavell, Mertz & Davis, Inc.*, is a Registered Professional Engineer in Virginia, holds a Bachelor of Science degree from Old Dominion University in Electrical Engineering Technology, and has submitted numerous engineering exhibits to various local governmental authorities and the Federal Communications Commission. His qualifications are a matter of record with that entity.

A handwritten signature in black ink, appearing to read 'Joseph M. Davis', is written over a horizontal line.

Joseph M. Davis, P.E.

June 23, 2000

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